

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BHUSHAN ATHALE, et al., Individually and	:	Civil Action No. 1:11-cv-05831-AJN
on Behalf of All Others Similarly Situated,	:	(Consolidated)
	:	
Plaintiffs,	:	<u>CLASS ACTION</u>
	:	
vs.	:	NOTICE OF MOTION FOR FINAL
	:	APPROVAL OF PARTIAL SETTLEMENT
SINOTECH ENERGY LIMITED, et al.,	:	AND PLAN OF DISTRIBUTION OF
	:	SETTLEMENT PROCEEDS, AND AWARD
Defendants.	:	OF ATTORNEYS' FEES AND EXPENSES
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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that upon: (i) the Declarations of David A. Rosenfeld affirmed on June 21, 2013; (ii) the Declaration of Christopher L. Nelson affirmed on June 18, 2013; (iii) the Settlement Agreement dated March 22, 2013 and the Exhibits annexed thereto; (iv) the Declaration of Carole K. Sylvester affirmed on June 19, 2013; (v) Lead Plaintiff's Memorandum of Law in Support of Motion for Final Approval of Partial Settlement and Plan of Distribution of Settlement Proceeds; (vi) Lead Counsel's Memorandum of Law in Support of Motion for an Award of Attorneys' Fees and Expenses; and (vii) all other proceedings herein, Lead Plaintiff will move this Court, before the Honorable Alison J. Nathan, United States District Judge for the Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York on August 29, 2013, at 10:00 a.m., for entry of orders and judgments pursuant to Rule 23 of the Federal Rules of Civil Procedure (1) finally approving the settlement of the captioned litigation, (2) approving the Plan of Distribution of settlement proceeds, and (3) awarding Lead Counsel attorneys' fees plus expenses in the litigation.

DATED: June 21, 2013

Respectfully submitted,

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& DOWD LLP
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CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2013, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 21, 2013.

s/ David A. Rosenfeld

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